



PREMIER OF TASMANIA

31 AUG 2023

Dr Lisa O'Brien AM
Panel Chair
Review to Inform a Better and Fairer Education System
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Dear Dr O'Brien

Thank you for the opportunity to provide a submission on behalf of the Tasmanian Government in response to the consultation paper for the *Review to Inform a Better and Fairer Education System* which will advise Education Ministers on the targets and reforms that will drive improvements to support better student outcomes.

The Tasmanian Government welcomes the scope of this Review in its focusing on driving real improvements in learning and wellbeing outcomes for students. At its core, the National School Reform Agreement (NSRA) must be aimed at improving the education outcomes of all students and how they interact with their learning environments to ensure they are set up for success in their later lives. To achieve this, States need ongoing funding certainty and flexibility. Commonwealth funding must never be contingent on achievement of performance targets, it is counterintuitive and would lead to further inequality.

As flagged in the previous Tasmanian Government submissions to the Productivity Commission's Review of the NSRA, we are firmly of the view that the next NSRA reforms must be fewer in number, recognise the work already underway at the local level and be undertaken in the true spirit of collaboration.

Lifting student outcomes

The next NSRA should have one overarching focus: lifting student outcomes. The Tasmanian Government is fully committed to closing the gap in advantage and ensuring more equitable outcomes for our learners. This influences how the Department for Education, Children and Young People (DECYP) defines its purpose and delivers education across Tasmania, including significant state investment in the early years. The focus of this approach is to lift student outcomes and support teachers through improving teacher knowledge and addressing workload impact, which also enables the retention of quality teachers.

Further, DECYP has a system priority of reading that recognises the foundational skills such as literacy which underpin a student's ability to learn and succeed at school – this also led to the development of the Literacy Plan for Action, with the goal of developing 100 per cent functional literacy across Tasmania.

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Education in Tasmania is delivered across diverse contexts that present unique challenges. These challenges impact our service delivery costs and include geographic isolation; a highly dispersed population; and pockets of entrenched, intergenerational disadvantage. The Tasmanian Government's strategic direction for education in the State is shaped by these challenges and addressing them to improve the access, participation and engagement of all young Tasmanians in education, a pre-condition to the improvement of learner outcomes.

There are no agreed-upon definitions for equity at a national level. The definition of educational advantage is also outdated and is not nationally workable. In the absence of this, the Review should consider how States can agree a shared framework for conceptualising intersecting forms of equity cohorts and disadvantage. This would support consistent principles and evidence for understanding and addressing educational disadvantage and equity.

The high levels, and concentrations of, disadvantage in Tasmania seriously impacts on the outcomes of our learners throughout school, with reduced engagement with education including attendance, attainment, and achievement. Learners from disadvantaged backgrounds require a range of supports to simply get them to a position where they are at school, ready to learn – let alone providing them with a quality, meaningful education when they are there. Any additional resources to support these equity cohorts is quickly consumed by this need.

The challenges in supporting learners that have fallen behind underlines the importance of national collaboration. As a small state Tasmania has limited capacity to develop and implement significant reform projects on its own, and the NSRA should provide an opportunity for Tasmania to work collaboratively with the Australian Government and other States and Territories to deliver for learners in ways it might otherwise not be able to. Throughout the previous NSRA, Tasmania has benefitted from the major initiatives aimed at improving outcomes for learners through collective expertise and resourcing. This has included the review of senior secondary pathways, major data projects such as the Student Wellbeing and School Readiness projects and contributing to the establishment and operation of the Australian Education Research Organisation.

Supporting the most vulnerable learners and working to improve their outcomes requires collective effort and partnership. However, it must be recognised that the experience of disadvantage, and support required, vary greatly across cohorts and jurisdictions. Therefore, while the Tasmanian Government would be supportive of a concerted effort and commitment to address educational outcomes for vulnerable students, jurisdictions must be allowed to undertake activities that best suit the needs of their students, tailored to their circumstances. Schools and jurisdictions know their students best, and it would be counterintuitive and unproductive to implement a one-size-fits-all approach.

Improving student mental health and wellbeing

Student mental health and wellbeing is critical to lifting student outcomes. The wellbeing of all students is a priority for the Tasmanian Government, and I consider our approach to supporting the wellbeing of children and young people as nation leading. Tasmania welcomes the Expert Panel's recognition of the need for the next NSRA to leverage existing work in this space undertaken by States. This work could be strengthened through national collaboration; however, it is critical that any national approach to improving mental health and wellbeing adds value to our existing work and does not impact its efficacy or our ability to continue its implementation.

Of particular importance is guidance to identify and evaluate appropriate interventions. Wellbeing for learning is firmly embedded in Tasmanian Government schools, but more guidance is needed on the insertion of effort to address complex problems and then evaluation of the effectiveness of this effort.

DECYP has an ongoing focus on addressing in-school factors affecting student mental health and wellbeing and ensuring that Tasmanian learning environments enable our learners to be known, safe and well and learning. The Child and Student Wellbeing Strategy¹ puts the child at the centre of our work to improve wellbeing and supports wellbeing for all learners. It recognises that, for some learners, extra support may be required to help them engage in learning.

Together with South Australia and ACT, Tasmania has one of the strongest student wellbeing data sets in Australia. Wellbeing can be measured in different ways to support student outcomes, which is demonstrated by the differing approaches among jurisdictions. DECYP uses data from the annual Student Wellbeing and Engagement Survey² to measure student wellbeing at a school and system level, inform planning and measure the impact of embedding trauma informed practices and approaches.

A national measurement of wellbeing in children and young people through the next NSRA would not provide value or offer any meaningful positive impact on students and may compromise the ongoing validity of our existing survey and high participation rates. If wellbeing is to be included in the next NSRA the effort should be focused on evidence-based practices aimed at addressing the root cause of poor wellbeing in students that occur within the school gates, that negatively impacts on learning. This may include (but is not limited to) strategies to address bullying, practising healthy behaviours, and improving employment opportunities for support staff in schools. This would also help prevent potential scope creep – by narrowing in the focus to what wellbeing supports should look like, in a school context. It will allow us to identify practices and solutions that are within the school's sphere of influence.

The consultation paper highlights the impact of external factors (including trauma) on learning outcomes and the need to have systems in place to identify and address students' additional needs where possible. DECYP currently funds 455 individual students impacted by trauma annually. The process for allocating the funding for individual students in DECYP operates outside of the Educational Adjustments funding model supporting students with disability and highlights an unmet need for support which is supported by significant investment by the Tasmanian Government.

As acknowledged in the Terms of Reference of the review, should the next NSRA include a focus on student mental health and wellbeing, it must be specific to what can be addressed in schools – and not just by teachers. Schools do not have any remit to address issues outside the school gate that may impact a student's mental health and too often teachers are being expected to solve issues that they are not qualified for. DECYP is concerned that teachers are increasingly being viewed as the panacea to all ills in learning environments, which is putting increasing pressure on them despite already dealing with heavy workloads.

¹ [Child and Student Wellbeing Strategy \(PDF, 19MB\)](#)

² [Student Wellbeing and Engagement Survey](#)

We need to unpack how the NSRA can contribute to improving student mental health and wellbeing without targets or burdensome or punitive measurements. Any national work in this space must complement, and not override, the important work already underway at a jurisdictional level. Additionally, more clarity is required on how intersecting national approaches to student wellbeing are, or could be, aligned through the NSRA while avoiding duplication. For example, this could be through the work of:

- the Australian Education Research Organisation;
- the Australian Schools Anti-Bullying Collective;
- the National Student Wellbeing Project (established under the previous NSRA and re-established to inform this Review);
- the Respectful Relationships Expert Working Group;
- the National Mental Health and Suicide Prevention Agreement Schedule A working group; or
- the National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030.

Consideration should be given to what extent school leaders and teachers have the skills and training to support students struggling with mental health. Asking our school leaders and teachers to be responsible for this also risks reducing the time to teach. For schools to properly support students struggling with mental health, our staff need to be experiencing a workplace culture that supports good mental health, safety, and wellbeing. Further work should be done to understand the intersection between staff health, safety, and wellbeing, and whether the NSRA adequately supports and resources this.

Attracting and retaining teachers

The Tasmanian Government agrees with the statement within the consultation paper that attracting and retaining teachers is a critical issue being felt at a national level. This issue has been amplified in the context of the pandemic and our teaching workforce has shown enormous resilience during this challenging period.

As we noted in our submissions to the Productivity Commission’s review that it is critical that the next NSRA avoids duplication of existing national work that is underway or ongoing. The National Teacher Workforce Action Plan (NTWAP) is a concerted and collaborative effort from the Commonwealth, States and Territories, the non-government sector and other education stakeholders to progress solutions for workforce challenges. The next NSRA must not risk duplicating or overriding the work already agreed to as part of the NTWAP.

If the next NSRA is to have a focus on wellbeing, consideration should be given to the wellbeing of the education workforce, particularly teachers – not only learners. We know that stress in the workplace is a major contributor to the challenges facing the teaching workforce, including leaving the profession. The NTWAP only scratches the surface regarding wellbeing,³ and more can be done in this space. Embedding school staff wellbeing into the next NSRA will strike a balance between a focus on workforce challenges and not duplicating existing national effort.

³ Action 27 – Develop and publish data about teacher wellbeing and career intentions.

Data collection

Government decision-making must be supported by robust evidence and analysis. There will always be opportunities to improve data to support future education needs, but data should not be collected for the sake of it. Schools and systems collect a significant amount of data already – therefore the next NSRA must not further add to the administrative burden faced by schools and State and Territory Governments.

The NSRA is an opportunity for national collaboration on approaches to data collection, governance arrangements and consistent reporting to improve our education system. Targets and reforms in the next NSRA should be based on the best available evidence. This evidence needs to include a solid understanding of what works in successful education systems and how to implement reforms effectively.

Ministers must collaborate in seeking to establish shared interests and identify and define the issues to be addressed, before co-designing proposed solutions. Focusing on collaboration on process will support consistency in jurisdictional data and improve the information and our understanding to drive improvements in education outcomes.

There remains ongoing work through the current NSRA on the Unique Student Identifier (USI). Education Ministers have agreed to a baseline use for the USI and that no further uses will be considered until the initiative is fully implemented and every and every school student has a national USI. The Tasmanian Government continues to advise caution in relation to promoting untested data collection ‘solutions.’

Any potential expansion of the uses of the USI ensure that new data is only collected where the benefits in understanding the data outweigh the costs of acquiring the data and demonstrated real benefit to our learners. This should be the approach taken on all matters relating to data collection in the next NSRA. There must be clear communication to and from all parties – to each other and to the broader community – on what the purpose of the data collection is, and how it is in the best interests of our children and young people.

Transparency and accountability for school funding

The NSRA must recognise the role of States as owners of schooling systems and potential parties to a future agreement. States and Territory Governments are the primary service deliverers and majority funders of public education and operate with a clear understanding of their individual contexts. The next NSRA must provide States with funding certainty that allows for appropriate planning of actions to improve student outcomes and the engagement of a quality workforce in learning environments.

The Tasmanian Government remains committed to ensuring public funding is appropriately spent and continues to do so across a range of portfolios. Increased accountability and transparency measures should be considered for all providers and recipients of public funding. All jurisdictions already have robust public accountability and transparency mechanisms in place for Government schools, including through their respective Parliaments, to improve transparency. Further, to ensure effective and efficient delivery of quality schooling, States must have flexibility in determining how to allocate and distribute funding. The next NSRA must at least maintain States' current level of flexibility to distribute recurrent funding according to school and student need.

In considering how funding transparency and accountability can be improved, the Review should clearly articulate if the focus is on both the government and non-government sectors. There must also be recognition that the NSRA is a partnership between the Australian Government and States and Territories, and that funding is jointly contributed. Accountability and transparency must also be balanced with administrative burden. Changes should focus on simplifying, and standardising reporting to reduce the administration and compliance overheads on schools and State Governments. As flagged in the previous section on data collection, any reporting and accountability should be careful not to duplicate the extensive reporting that is already undertaken by our schools.

The NSRA must be aimed at improving the education outcomes of all students and how they interact with their learning environments to ensure they are set up for success in their later lives. Thank you for the opportunity to provide comment on the Review to Inform a Better and Fairer Education System. The Tasmanian Government looks forward to receiving the final report in October.

Yours sincerely



Jeremy Rockliff MP
Premier